

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

FILED

for the

Northern District of California

AUG 30 2019

United States of America  
v.  
JOSEPH ALBERT COREY

Case No.

3:19 71405

TSH

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 3, 2019 in the county of San Francisco in the  
Northern District of California, the defendant(s) violated:

## Code Section

## Offense Description

18 U.S.C. § 1341

Mail Fraud

## Maximum Penalties:

20 years imprisonment

3 years supervised release

\$250,000 fine

\$100 special assessment

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Sarah Bak of the Federal Bureau of Investigation.

☐ Continued on the attached sheet.

Approved as to form

AUSA Katie Medearis

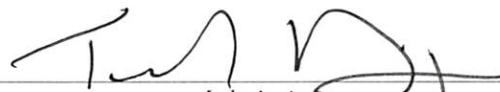


Complainant's signature

Sarah Bak, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/29/2019City and state: San Francisco, CA


Judge's signature

Hon. Thomas S. Hixson, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF SARAH BAK  
IN SUPPORT OF CRIMINAL COMPLAINT**

I, SARAH BAK, Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, do declare and state:

**I. INTRODUCTION**

**A. Purpose of Affidavit**

1. This Affidavit is made in support of a Criminal Complaint against JOSEPH ALBERT COREY (hereafter, "COREY") for violating Title 18, United States Code, Section 1341 (Mail Fraud). As set forth below, there is probable cause to believe that COREY knowingly and intentionally engaged in a scheme to defraud a hotel company, referred to herein as Victim-1, by obtaining money by false or fraudulent pretenses and used the mail to carry out an essential part of his scheme. This Complaint seeks to charge COREY with One Count of violating 18 U.S.C. § 1341 on or about April 3, 2019.

2. Through my participation in the subject investigation, I learned that COREY has likely been using one or more aliases, including "Dennis Dupont," to order gold coins via the U.S. mail and/or commercial interstate carrier using money obtained through the deposit of fraudulent, unauthorized checks drawn on Victim-1's business account.

**B. Applicable Law**

3. The Supreme Court has held that "[t]here are two elements in mail fraud: (1) having devised or intending to devise a scheme to defraud ..., and (2) use of the mail for the purpose of executing, or attempting to execute, the scheme." *Schmuck v. United States*, 489 U.S. 705, 721 (1989). More specifically, 18 U.S.C. § 1341 provides, in pertinent part:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, ... for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent

or delivered by the Postal Service, ... or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, shall be fined under this title or imprisoned not more than 20 years, or both.

**C. Sources of Information**

4. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause for an arrest warrant for defendant JOSEPH ALBERT COREY, I have not included each and every fact known to me that supports probable cause for arrest. Rather, I have set forth only the facts that I believe are necessary to support the lawful arrest of the individual listed in this Affidavit. In addition, where statements made by other individuals (including other Special Agents and law enforcement officers) are referenced in this Affidavit, such statements are described in sum and substance and in relevant part. Similarly, where information contained in reports and other documents or records are referenced in this Affidavit, such information is also described in sum and substance and in relevant part. Further, my interpretation and explanations of the significance of certain events, records, and statements discussed herein may evolve or change as the investigation progresses and/or new information is discovered.

**II. AGENT BACKGROUND**

5. I am a Special Agent (SA) of the FBI and have been so employed since March 2018. I am currently assigned to the San Francisco Field Division of the FBI, and I investigate white collar crime cases. I have received training at the FBI Academy in Quantico, Virginia, including training on white collar crimes. During my employment with the FBI, I have conducted physical surveillance, searches, arrests, interviews of witnesses, victims, and subjects, and transport of prisoners. I have participated in investigations involving a variety of federal crimes, including, but not limited to mail fraud, wire fraud, drug trafficking, and witness tampering. I have also consulted with senior agents with the FBI in course of my training and

experience. Prior to my employment with the FBI, I was a Certified Public Accountant, specializing in taxation. I earned a Master's of Accountancy from Colorado State University as well as a B.S. in Business Administration in Accounting and Finance from the University of Colorado at Boulder.

6. I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

### III. STATEMENT OF PROBABLE CAUSE

A. **In February 2019, an unknown subject opened a US Bank account under the name "Dennis Dupont DBA Medical Practice Management."**

7. On or around February 1, 2019, an individual presenting himself as "Dennis Dupont" opened a business checking account (account number ending in -1183) at US Bank, N.A. (the "1183 Account"). The Resolution of Sole Proprietorship filed with the bank identifies "Dupont" as the "President" of "Medical Practice Management," and grants him the authority to make deposits into and withdrawals from the account. The Signature Card—which "Dupont" also electronically signed on February 1, 2019—lists the "Account Title" as "DENNIS DUPONT DBA MEDICAL PRACTICE MANAGEMENT," and identifies Medical Practice Management as a sole proprietorship. Medical Practice Management's address is listed as 1900 Powell St., Emeryville, CA 94608-1811. A security camera captured an image of "Dupont" wearing glasses and opening the account, as shown below:



B. In March 2019, “Dupont” deposited checks into the 1183 Account using funds from an account owned by Victim-1.

8. On or around March 19, 2019, an individual identifying himself as “Dennis Dupont” deposited a check made out to Medical Practice Management in the amount of \$34,856.02 into the 1183 Account. The check is numbered 70224 and lists Victim-1 as the account holder with Bank of America and a listed address in Los Angeles, California. Below is a partially redacted copy of the deposited check (Check 70224):

70224

LOS ANGELES, CA 90057

DATE 3/18/2019

PAY TO THE ORDER OF MEDICAL PRACTICE MANAGEMENT \$34,856.02

Thirty Four Thousand Eight Hundred Fifty Six and 02/100 DOLLARS

BANK OF AMERICA

MEMO

FOR DEPOSIT ONLY

US BANK-8857

SALINAS NOB HILL

DO NOT SIGN BELOW THIS LINE

FOR DEPOSIT

9. “Dupont” also submitted a US Bank counter deposit slip along with Check 70224, which lists the 1183 Account under “Account Number.” A partially redacted copy of the counter deposit slip is included below:



**usbank** COUNTER DEPOSIT

All of us serving you

DATE 3-18-19

DEPOSIT TO THE ACCOUNT OF Medical Practice Management

SIGN ABOVE FOR CASH RECEIVED

CHECK OR TOTAL FROM OTHER SIDE 34,856.02

LESS CASH RECEIVED

**\$ 34,856.02**

08857 0001 03/19/2019 02:39 USB

**\$34,856.02**

10. Additionally, a security camera captured an image of “Dupont” depositing Check 70224, included below. Based on my training and experience, as well as common sense, I know that individuals seeking to conceal their image from security cameras will often wear sunglasses, hats, or other facially-obscuring items. Further, I believe it is atypical for individuals to wear sunglasses while indoors.



11. On or around March 29, 2019, “Dupont” deposited another check (Check 70254) from Victim-1’s account into the 1183 Account in the amount of \$102,805.95. Like Check

BAK AFF. ISO COMPLAINT  
[UNDER SEAL]

70224, Check 70254 is made out to Medical Practice Management and lists Victim-1 as the Bank of America checking account-holder. Based on my review of the check below, as well as the one above, the endorsement signatures appear to match (see arrow). A partially redacted copy of Check 70254 is included below:

LOS ANGELES, CA 90067  
DATE 3/18/2019  
70254  
PAY TO THE ORDER OF MEDICAL PRACTICE MANAGEMENT \$102,805.95  
One Hundred Two Thousand Eight Hundred Five and 95/100 DOLLARS  
BANK OF AMERICA  
MEMO  
AC # 15750752183

12. "Dupont" also submitted a US Bank counter deposit slip along with Check 70254, which lists the 1183 Account under "Account Number." A copy of the counter deposit slip is included below:

usbank COUNTER DEPOSIT  
DATE 3-29-19  
Medical Practice Management  
ACCOUNT TITLE (PRINT)  
CASH  
CHECK  
CHECK ON TOTAL FROM OTHER SIDE  
BUS TOTAL  
LESS CASH RECEIVED  
\$ 102,805.95  
07277 0004 03/29/2019 10:15 USF  
DEPOSIT H  
\$102,805.95

BAK AFF. ISO COMPLAINT  
[UNDER SEAL]

13. Additionally, a security camera captured an image of “Dupont” depositing Check 70254. Once again, “Dupont” is wearing facially obscuring accessories, to include a hat and sunglasses, as shown in the image below. It should be noted, however, that “Dupont” appears to have shaved his facial hair between depositing the first fraudulent check and the second fraudulent check.



14. On or around April 2, 2019, “Dupont” deposited another check (Check 70334) issued from Victim-1’s account into the 1183 Account in the amount of \$6,419.03. Like Check 70224 and Check 70254, Check 70334 is made out to Medical Practice Management and lists Victim-1 as the Bank of America checking account-holder. A partially redacted copy of Check 70334 is included on the following page. Once again, the endorsement signature appears to match prior check endorsements (see arrow).



ALL ITEMS ARE ACCEPTED SUBJECT TO OUR RULES  
AND REGULATIONS APPLICABLE TO THE ACCOUNT.  
HAWAIIAN CLARKE 70097 (01/11) 90024708

**usbank**

COUNTER DEPOSIT

DATE 4/2/19

Medical Practice mgmt

ACCOUNT TITLE (PRINT)

SIGN ABOVE FOR CASH RECEIVED

ACCOUNT NUMBER

CASH ☒

CHECK ☐

CHECK OR  
TOTAL FROM ☐

SUB TOTAL ☐

LESS CASH  
RECEIVED ☐

\$

\$6,419.03

16. Additionally, a security camera captured an image of “Dupont” depositing Check 70334, as shown below. Once again, he wore the same type of facially concealing accessories:



17. On or around June 29, 2019, a FBI agent spoke with “A.A.”, the Treasury Manager for the Americas region of Victim-1’s company. A.A. confirmed that she was aware of Check 70224, Check 70254, and Check 70334, which had been drawn against Victim-1’s checking account in March 2019. A.A. confirmed that the checks were fraudulent and not authorized by Victim-1. She noted that Victim-1’s account from which the checks were drawn normally had no checks drawn against it. Moreover, she explained that Victim-1’s name was not correctly printed on the checks. Further, the Los Angeles address on the checks was also not correct. A.A. further reported that Medical Practice Management (i.e. the check recipient) was not in Victim-1’s vendor database.

18. A.A. informed the agent that Victim-1 had reported the fraudulent checks to Bank of America. According to A.A., although Check 70254 and Check 70334 were rejected by

Bank of America's fraud protection services, Check 70224 was successfully deposited due to a bank error. A.A. stated that Bank of America later credited Victim-1's account for the full amount of Check 70224 (\$34,856.02).

**C. "Dupont" purchases gold coins using the fraudulently obtained funds from Victim-1.**

19. On or around March 28, 2019, an individual using the name "Dennis Dupont" placed order number 38681 with SchiffGold for twenty-four 1 oz. "Gold Eagle" coins, priced at \$1,362 per coin, or \$32,688 total. SchiffGold provided the FBI with copies of email correspondence between SchiffGold representatives and "Dupont," using the email address medicalpman@gmail.com. On March 28, 2019, J.B., an individual known to the FBI and employed as a Senior Precious Metals Specialist at SchiffGold, sent an email to "Dupont" to "confirm [Dupont's] telephone or email instructions to us today." J.B. attached "Dupont's" purchase confirmation to the email, and also provided instructions for two payment options: (1) mailing a check to SchiffGold's office in New York; or (2) completing a direct deposit at a Bank of America branch into SchiffGold's account. "Dupont" emailed J.B. back: "Thanks [...], Taking care if [sic] the deposit right now."

20. Records obtained from US Bank include a copy of a check (Check 2115) payable to SchiffGold, dated March 28, 2019, signed by "Dennis Dupont" in the amount of \$32,688. The check was drawn against the 1183 Account and lists Medical Practice Management as the company with the address 4 Embarcadero Center, Suite 1400, San Francisco, CA 94111. The memo line includes SchiffGold order number 38681. A partially redacted copy of Check 2115 with deposit notations is included below:




MEDICAL PRACTICE MANAGEMENT  
4 EMBARCADERO CENTER  
SUITE 1400  
SAN FRANCISCO, CA 94111

DATE 3-28-19 2115

PAY TO THE ORDER OF SchiffGold LLC \$ 32,688.00  
Thirty Two Thousand, Six hundred eighty eight and 00/100 DOLLARS

US BANK

MEMO #38681

 Dennis Dupont

☒ **PAID**

① Printed name is handwritten name of bank's agent. Signature area only.

② **PAID TO ORDER OF**

③ **PAID TO ORDER OF**

④ **PAID TO ORDER OF**

⑤ **PAID TO ORDER OF**

⑥ **PAID TO ORDER OF**

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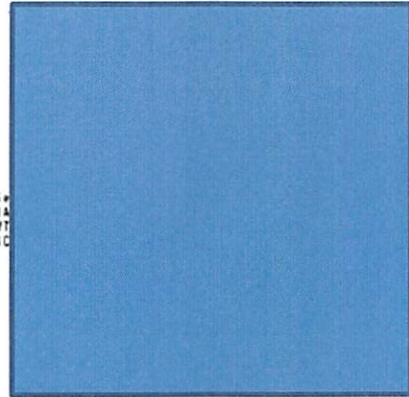
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*For Deposit*  
*32,688.00*  
*SchiffGold LLC*

DO NOT SIGNATURE STAMP AND THE LINE  
FOR FINANCIAL INSTITUTION USE ONLY

#### D. Use of Mail In Connection With Fraud Scheme

21. SchiffGold records indicate order number 38681 was shipped via overnight delivery on or about April 3, 2019 via UPS, an interstate commercial carrier to: Dennis Dupont, Medical Practice Management, Four Embarcadero Center, Suite 1400, San Francisco, CA 94111, US. An open-source database search of that address revealed that it is associated with Carr Workplaces – Embarcadero (“Carr”), a business providing virtual offices, mailboxes, and coworking spaces for rent. Based on my training and experience, I know that individuals involved in fraudulent conduct can use mailbox services stores to provide anonymity, false legitimacy, and/or make it more difficult for law enforcement to locate them or detect the scope of their scheme.

22. S.J., a Community Manager at Carr, informed me that an individual using the name “Dennis Dupont” had submitted an online application to rent a mailbox at Carr. S.J.



further informed me that an individual using the name “Dennis Dupont” came into Carr on one occasion to ask about how mailbox rental worked. S.J. described Dupont as a “big, tall man” who was wearing sunglasses and had bruises under his eyes. Of note, S.J.’s general description of “Dupont” is consistent with the bank security footage of “Dupont” included above.

**E. On April 4, 2019, “Dennis Dupont” picked up the package ordered from SchiffGold and was identified as COREY.**

23. Based on an order placed by “Dupont” on or about April 3, 2019, SchiffGold overnighted a package via commercial carrier from outside the state of California to the recipient address provided by “Dupont” following placement of the above-described order.

24. On April 4, 2019, I, along with other FBI Agents, conducted physical surveillance in the area of Four Embarcadero Center, San Francisco, California. At approximately 9:46 a.m., I observed UPS deliver the package from SchiffGold with the recipient listed as Medical Practice Management. An employee at Carr signed for the package, locked it in the mail holding area, and notified “Dupont” that a package had arrived for him.

25. At approximately 10:30 a.m., a male fitting the description of “Dupont” arrived at the security desk at Four Embarcadero Center. “Dupont” asked the employee at the front desk of Carr to retrieve his package. “Dupont” took the package from the front desk at Carr and exited the building. FBI agents followed “Dupont” on foot until approximately 10:43 a.m., when the agents observed “Dupont” enter the passenger seat of a white Hyundai sedan marked with Uber stickers at the corner of Drumm Street and California Street. The vehicle then departed the area. Agents were able to note the Uber vehicle’s license plate number.

26. Records obtained from Uber identify COREY as the passenger who entered the white Hyundai observed by Agents. The records also identified COREY’s phone number as 512-799-9935, and his email address as jactex18@gmail.com. Trip details show that COREY was picked up near where agents saw “Dupont” enter the vehicle, and that he was dropped off at

1865 Clay Street, San Francisco, California, at approximately 10:54 a.m.

27. The records obtained from Uber further show that COREY was frequently dropped off and picked up at 1890 Clay Street, San Francisco California. This address is the location of Clay Park Tower Apartments, managed by Trinity Property Management (“Trinity”). Records obtained from Trinity confirm that COREY rented an apartment at the Clay Park Tower Apartments. The records further indicate that COREY used his key fob to enter the Clay Park Tower Apartments lobby door at approximately 10:55 a.m., i.e. the same day that agents observed “Dupont” enter an Uber which dropped off an occupant at the same approximate time near this location.

**F. On April 8, 2019, COREY picked up the replacement package ordered from SchiffGold.**

28. At approximately 11:20 a.m. on April 4, 2019, M.M., a SchiffGold employee, contacted me and informed me that SchiffGold had shipped “Dupont” a book, rather than the gold he had ordered, on the mistaken assumption that “Dupont” would be arrested when he picked up the package. “Dupont” had called SchiffGold and was upset that he had received a book instead of gold. M.M. told me that SchiffGold had informed “Dupont” that SchiffGold sent a book due to a shipping error, and that SchiffGold would send him his gold immediately. “Dupont” then provided SchiffGold with new shipping instructions, requesting that the order be shipped to “Dennis Dupont, 100 Shoreline Hwy, Suite 100, Building B, Mill Valley, CA 94941.”

29. An open-source database search of 100 Shoreline Highway, Suite 100, Building B, Mill Valley, California revealed that it is associated with Office Evolution, a business similar to Carr that provides virtual offices and coworking spaces for rent.

30. Records obtained from Office Evolution showed that an individual identifying himself as “Dennis Dupont” rented mailbox #79 with a service start date of April 2, 2019. He listed “Medtronic-Medical Practice” as the Company Name for the mailbox.

31. On April 8, 2019, Agents conducted physical surveillance in the area of 100 Shoreline Highway, Mill Valley, California. At approximately 8:46 a.m., UPS delivered the replacement package from SchiffGold. An employee at the front desk of Office Evolution called “Dupont” to notify him that the package had arrived.

32. At approximately 10:04 a.m., Agents observed COREY driving a blue-colored Jaguar into the parking lot of Office Evolution. COREY parked and entered the building. Video surveillance from Office Evolution shows COREY enter Office Evolution and retrieve the package for “Dennis Dupont” from the employee at the front desk. COREY then exited Office Evolution, returned to his vehicle, and drove out of the parking lot. Of note, COREY wore accessories designed to conceal his face, including sunglasses and a hat.



**G. Further Identification of COREY and Vehicles Registered to Corey**

33. A records check of the Texas license plate associated with the Jaguar revealed that it was owned by JPMorgan Chase Bank. Records obtained from JPMorgan Chase Bank show the Jaguar was leased by COREY through the Jaguar Financial Group, the program under

which Chase Bank N.A. provides auto-leasing and account services to Jaguar customers. Records obtained from Trinity indicate that, in addition to his apartment, COREY leased a parking space for a blue Jaguar SUV with the same license plate.

34. In the course of the investigation, I located two driver's licenses for an individual named Joseph Albert COREY, which are included below. One of these licenses was issued by the State of Texas and the other by the State of California. The dates of birth listed on each match. The licensees' height is also a near match with one listing 6' 2" and the other listing 6' 3". The eye-color is listed as blue and hair-color as black. Of note, the California license depicts an individual with brown eyes as opposed to blue; however, I know that individuals may change their eye color with contacts. The licensees' listed weight is 190 pounds for the California license (photo dated 2013) and 220 pounds for the Texas license (photo dated 2018). Based on my training, experience, and common senses, I know that an individual's weight may fluctuate over a multi-year period. I believe the general appearance of the licensees match the descriptions and surveillance observations regarding COREY in this case.

TEXAS LICENSE:



CALIFORNIA LICENSE:



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BAK AFF. ISO COMPLAINT  
[UNDER SEAL]




#### IV. CONCLUSION

35. Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that JOSEPH ALBERT COREY committed mail fraud, in violation of 18 U.S.C. § 1341 on or about April 3, 2019. Based on the foregoing, I respectfully request that this Court issue a Criminal Complaint and Warrant of Arrest.

  
\_\_\_\_\_  
SARAH BAK  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me  
This 29th day of August, 2019

  
\_\_\_\_\_  
HONORABLE THOMAS S. HIXSON  
United States Magistrate Judge